

Keith Gutstein, Esq.
kgutstein@kaufmandolowich.com

Amanda Varrone, Esq.
Amanda.varrone@kaufmandolowich.com

January 8, 2025

VIA ELECTRONIC MAIL

Hon. Ramon E. Reyes, Jr.
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ghelichkhani v. N.Y. College of Traditional Chinese Medicine, et. al.
Docket No.: 23-CV-8629 (RER)(AYS)

Dear Judge Reyes:

As the Court is aware, this office represents Defendants New York College of Traditional Chinese Medicine, Yemeng Chen, Sunny Shen, Susan Su, Megan Haungs, Mona Lee-Yuan, and Kat Zhao (collectively, “Defendants”) in the above matter. Per the Court’s order issued on December 10, 2024, the deadline for Plaintiff to serve her Opposition to our Motion to Dismiss was extended from November 19, 2024 to December 23, 2024. As Plaintiff has apparently still failed to file and serve any opposition papers despite the extended deadline, we respectfully request that the Court deem the motion unopposed and render its decision based on the papers before Your Honor.

We thank the Court for its continued courtesies.

Respectfully yours,
Kaufman Dolowich LLP



Keith Gutstein
Amanda Varrone

All Parties, by ECF